



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



476512

REPLY TO THE ATTENTION OF:

MEMORANDUM

DATE:

SUBJECT: Enforcement Action Memorandum – Determination of Threat to Public Health and or the Environment at the Lindsay Light II Site/545 North McClurg Chicago, Cook County, Illinois (Site Spill ID # YT, OU 14)

FROM: Verneta Simon, On-Scene Coordinator *V/S*
Emergency Response Branch II – Removal Section 4

Eugene Jablonowski, Health Physicist
Emergency Response Branch I – Field Services Section

THRU: Sam Borries, Chief *Sam Borries*
Emergency Response Branch II

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Enforcement Action Memorandum is to further document the determination of an imminent and substantial threat to public health and the environment posed by the existence of radioactively-contaminated soils at the Lindsay Light II Operable Unit (“OU”) 14, 545 North McClurg Site (“Site”) and the need to expend funds from the Lindsay Special Account to pay for the transportation and disposal of radioactively-contaminated material identified at the site that will not be removed by the responsible party’s construction work. The Site is approximately 1.25 acres and is located in an area of Chicago known as “Streeterville” that, beginning in 1993, has been the subject of several removal actions to remove radioactive materials. To date, the U.S. Environmental Protection Agency has not initiated any response actions using the On-Scene Coordinator \$50,000/\$250,000 delegation and warrant authority. On June 30, 2014, U.S. EPA entered into an Administrative Settlement Agreement on Consent (ASAOC) with the property owner, Golub AKA GHB-630 LLC.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS # ILD 0000002212

A. Site Description

1. Removal site evaluation

During September 2000, EPA conducted a radiation walkover survey of the parking lot at 401 East Ohio (fka 410 East Grand and now called 545 N McClurg Court) to determine whether there were any elevated radiation readings at the surface that might indicate the presence of subsurface radioactive materials. Readings ranged from 1,598 counts per 30-seconds to 9,500 counts per 30-seconds. The highest elevated readings that occurred were near a tree on East Ohio Street (9,500 counts per 30-seconds) and near the adjacent high-rise building. The readings adjacent to the high-rise appear to be radioactivity associated with the brick of this building. For the readings near the tree, USEPA was unable to determine if they were due to thorium contamination or some other cause. On December 21, 2000, EPA sent the current owner, Rehabilitation Institute of Chicago, a letter stating our results of one elevated location in their parking lot, recommending that they perform radiation surveillance if they remove the asphalt, and also contact us prior to removing the asphalt. A copy of the letter dated December 21, 2000 is contained in its entirety in the Administrative Record.

2. Physical location

This Site is located at 545 N McClurg Court, Chicago, Cook County, Illinois. The Site is 1.25 acres. The geographical coordinates for the Site are Latitude 41.892 and Longitude 87.618. In the vicinity of this Site are three other Lindsay Light OUs, specifically, OU10 (400 East Illinois), OU 00 (316 East Illinois) and OU 3(341 East Ohio).

An environmental justice ("EJ") analysis was performed and is contained in Attachment 1. Screening of the surrounding area used Region 5's EJ Screen Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT). Region 5 has reviewed environmental and demographic data for the area surrounding the site at 545 N McClurg Court, Chicago, Illinois, and determined there is a low potential for EJ concerns at this location.

3. Site Characteristics

This property was most recently used as a parking lot.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Thorium is an extremely long-lived contaminant (14 billion years) and that may present a threat of release for many future generations if it is not removed during this construction work.

In addition, thorium contains radium 226 and radium 228, which are radionuclides and are hazardous substances as defined by CERCLA 42 U.S.C. 101(1). Radium has a half-life of 1,620 years. Neither the City of Chicago's computerized permit application system or recorded environmental covenants have proved completely effective at eliminating unmonitored intrusions into radioactively-contaminated subsurface soils. This addendum is intended to reduce the amount of radioactively-contaminated soils remaining that may present a threat of release.

Prior to the execution of the ASAOC, GHB-630 LLC's environmental consultant, RPS GaiaTech discovered elevated gamma and had analytical results of 9.1 pCi/g and 170,000 pCi/g. Figure 1 is attached to show the three areas, which the PRP have identified to date. The Streeterville clean-up criterion is 7.1 pCi/g (Radium 226 + Radium 228).

The material that was identified as 170,000 pCi/g has been transferred from GaiaTech's subcontracted laboratory, Radiation Safety Services, Inc. (RSSI), to Argonne National Laboratory for forensics. Copies of pertinent surveys, e-mail messages and analytical reports are contained in the Administrative Record.

In addition to radioactive contamination, in April 2014, asbestos-contaminated gas light mantle ties and pieces of gas light mantle brackets were identified at Navy Pier, east of OU 14.

5. NPL status

This site is not on the National Priorities List (NPL).

B. Other Actions to Date

1. Previous actions

The EPA has been assessing and overseeing the cleanup of Lindsay Light-related contamination in the Streeterville area of Chicago since 1993. In 1996, U.S. EPA issued a Unilateral Administrative Order ("1996 UAO") to Kerr-McGee Chemical LLC, the successor corporation to Lindsay Light, and to the owner and developer of 316 East Illinois Street. In 2000, EPA amended the UAO to include the property west of the site, 200 East Illinois, otherwise known as Lindsay Light II/RV3 Site. Since 2000, with EPA's direction and oversight generally provided pursuant to consensual orders, property owners and developers have investigated and cleaned up more than 12 radioactively-contaminated properties associated with Lindsay Light contamination in Streeterville. The action memoranda and respective administrative records for these actions are incorporated by reference into this decision document as set forth in the administrative record (Attachment 2). Typically, all radioactively-contaminated material identified has been removed and disposed of at a facility licensed to accept such material. Generally, the only known radioactive contamination exceeding the cleanup standard allowed to remain in place in Streeterville or West Chicago has been intertwined with utilities or infrastructure of road ramps.

2. Current actions

GHB-630 LLC, is the owner and developer of this property. This property was originally owned by the Rehabilitation Institute of Chicago (RIC), swapped land with RIC to receive 545 North McClurg and transfer 630 North McClurg to RIC. As of June 30, three distinct areas of elevated gamma were identified at the property and are depicted in Figure 1.

C. State and Local Authorities' Roles

1. State and local actions to date

In 1999, at EPA's request, the City of Chicago through the Department of Environment established Right-of-Way permit procedures to ensure radiological screening before and during work exposing or intruding into subsurface soils in Streeterville rights-of-ways. A description of the procedures and a map of the Streeterville Thorium Investigation Area are available on the City of Chicago's website. EPA's Thorium Monitoring Area map is also attached to this Memorandum as Figure 2. These permit procedures have been useful but not 100% effective in preventing unmonitored intrusions into subsurface soils.

The State of Illinois's role is described below in Section C.2.

2. Potential for continued State/Local response

Beginning in 1993, EPA has directed CERCLA response activities for Lindsay Light-related radioactive contamination in Streeterville. In 1993, the Illinois Department of Nuclear Safety (now known as the Illinois Emergency Management Agency, Division of Nuclear Safety or "IEMA") participated in a joint building survey with U.S. EPA and ATSDR. IEMA has had very limited involvement with the Lindsay Light removal sites because the Lindsay Light facility in downtown Chicago did not hold a license from the Atomic Energy Commission or the Nuclear Regulatory Commission ("NRC") or the Illinois Agreement State authority conferred by the NRC. In contrast, IEMA has been and is currently involved with the Kerr-McGee West Chicago National Priorities List ("NPL") sites associated with the Rare Earths Facility. The Rare Earths Facility was a federally licensed radioactive materials facility and is currently licensed by IEMA, under Agreement State authority. Due to limited resources, it appears unlikely the State will now choose to become involved in the unlicensed Lindsay Light response and enforcement activities.

The EPA has been working to develop the City of Chicago's capacity to conduct future radiation monitoring and cleanup of its rights-of-ways by awarding a \$2.5 million Cooperative Agreement to the City of Chicago on September 25, 2012 to address the contamination in the City-owned Streeterville rights-of-ways. This Cooperative Agreement and a similar \$250,000 Cooperative Agreement with the Chicago Park District to remove radioactive contamination in DuSable Park were funded by a bankruptcy settlement with Tronox, LLC, a former subsidiary of Kerr-McGee and successor to Lindsay Light. If the proposed Anadarko Settlement Agreement is approved by a federal district court and withstands any appeals, the City and Chicago Park District, will be eligible for an additional estimated \$40 million and \$9 million in settlement funds administered under the Cooperative Agreements.

III. THREAT TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

Conditions at the Site may pose an imminent and substantial endangerment to public health or welfare or the environment, based upon factors set forth in the National Contingency Plan ("NCP"), 40 Code of Federal Regulations ("CFR") Section 300.415 (b)(2). These conditions include:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Given our extensive experience in Streeterville, the proximity of this site to other Lindsay Light contaminated properties, the latest soil concentration sample and gamma results, it has been demonstrated that radioactively-contaminated soils related to Lindsay Light are present at this Site. Given the property owner's pending construction and subsurface work, an actual exposure threat exists. On June 30, 2014, EPA entered into an ASAO with the property owner, GHB-630 LLC.

High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;

Given the elevated gamma measurements detected on June 12, 2014 and the analytical soil results of 9.1 pCi/g and 170,000 pCi/g, if proper measures to identify and control radiological contamination are not implemented, radioactively contaminated wastes may be released during current construction work. Post-construction institutional controls may not be effective in preventing exposure to these materials due to the long-lived nature of the contaminant.

Other situations or factors which may pose threats to public health or welfare or the environment;

Beginning in approximately 1904, Lindsay Light manufactured gas lights and gas mantles for residential and commercial use, at several locations in the Streeterville neighborhood of Chicago. Lindsay Light's manufacturing processes resulted in radioactive wastes, including a sandy waste known as mill tailings that was often used as fill material. The November 1935, Lindsay Light Board of Directors' meeting minutes discussed plans to move Lindsay Light's Streeterville operations to the City of West Chicago by September 1936. The West Chicago facility became known as the Rare Earths Facility or REF. In West Chicago, Lindsay Light and its successors continued to produce thorium as well as other radioactive materials for commercial and defense-related purposes. As a result of Lindsay Light's Rare Earths Facility thorium manufacturing and disposal activities, four West Chicago areas were listed on the NPL.

In the West Chicago area, EPA, with the assistance of IEMA, has overseen the clean-up of over 675 properties in residential areas including radioactively contaminated basements and foundations, a 100-acre public park, a sewage treatment plant, and over six miles of creek and river in DuPage County. The widespread use and dispersal of the radioactive material as fill in West Chicago likely reflects a similar widespread dispersal of the Lindsay Light radioactive residuals in Chicago. Unlike the relatively open areas in the City of West Chicago where the extensive nature of the radioactive contamination was relatively easy to identify, most of the Lindsay Light thorium was shielded from detection by asphalt, sidewalks, streets, and buildings. Consequently, appropriate response actions are necessary to monitor for radioactive contamination whenever subsurface soils are excavated or exposed to assure construction activities will not result in the uncontrolled exposure to or release of radioactive contamination or improper disposal of the radioactively-contaminated soils at or from the Site.

The availability of other appropriate federal or state response mechanisms to respond to the release;

As described in Section II and the Administrative Record, to date EPA has taken the lead in investigating and directing the cleanup of Lindsay Light-related radioactive contamination in Streeterville. Private PRPs, such as the owner of GHB-630 LLC, have routinely entered into ASAOs with U.S. EPA and pursuant to the ASAOs; those private PRPs have funded the cleanups and paid EPA's response costs. There are no other appropriate federal or state response mechanisms to respond to the release.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the contaminants, radioactive materials that cause external exposure, inhalation, ingestion, and direct contact hazards, as described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions:

1. Proposed Action Description:

PRP activities at this Site will include, but are not limited to, excavation and proper disposal of contaminated soils prior to construction of a 44-story high-rise building. The Site owner has agreed to remove and dispose of radioactively-contaminated material directly encountered during construction work and to place a recorded uniform environmental covenant institutional control on the Site that runs with the land and that will require radiation monitoring whenever subsurface soils at the Site are exposed or excavated. EPA proposes to augment the PRP-led work and use Lindsay Light II Special Account funds to transport and dispose of

radioactively-contaminated subsurface soils that are identified during the construction work but are not directly disturbed by the construction work. The PRP will continue to pay for the cleanup and transportation and disposal of radioactively-contaminated materials directly encountered during construction.

2. Contribution to Remedial Performance:

The proposed action will not impede future responses based upon available information.

3. Applicable or Relevant and Appropriate Requirements (ARARs)

All applicable or relevant and appropriate requirements ("ARARs") will be complied with to the extent practicable. The primary federal Applicable or Relevant and Appropriate Regulation for radioactive soil cleanup criteria is Title 40 CFR Part 192, "Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings." Ancillary ARARs include the Nuclear Regulatory Commission's ("NRC") Title 10 CFR Part 20, "Standards for Protection Against Radiation," NRC Regulatory Guide 1.86, "Termination of Operating License for Nuclear Reactors," and the Department of Transportation's Title 49 for shipping hazardous materials. Relevant EPA guidance includes OSWER Directive No. 9200.4-25, issued February 12, 1998, regarding the "Use of Soil Cleanup Criteria in 40 CFR Part 192, as Remediation Goals for CERCLA Site."

Many of the regulations carried out by the NRC have been delegated to the Illinois Emergency Management Agency, Division of Nuclear Safety. The State has previously identified the regulations at 32 Ill. Administrative Code 332, Licensing Requirements for Source Material Milling Facilities which contain the licensing requirements for source material milling facilities in Illinois as relevant and appropriate to the cleanup of thorium in Streeterville. The cleanup standard for soils and sediment at the Site derived from the foregoing federal and state regulations is 7.1 pCi/g combined radium.

EPA will also implement the principle of ALARA (As Low As Reasonably Achievable) that refers to the cleanup of all materials above the cleanup standard, to the extent practicable. ALARA is described in DOE and NRC orders and regulations and in EPA regulations at 40 CFR § 192.22. EPA made the decision to achieve ALARA in an attempt to maximize protection of human health.

4. Project Schedule:

Not applicable

B. Estimated Costs:

Not available, since this is an Enforcement Action Memorandum.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an

imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

VI. CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or non-action may result in increased likelihood of external exposure, inhalation, ingestion or direct contact to human populations accessing and working on the site. Also, since there is no threshold for radiological risk, additional exposure to radiological materials will increase the cancer risk.

VII. OUTSTANDING POLICY ISSUES

Tronox, the successor corporation to Kerr-McGee and Lindsay Light, the entity responsible for generating and disposing of the radioactive contamination resolved its liability to EPA as part of a bankruptcy settlement. The bankruptcy settlement included Tronox's payment to U.S. EPA of funds to establish a special account for the costs of response associated with the Lindsay Light sites in Streeterville. This is the initial use of the Lindsay Light II Special Account to fund transportation and disposal costs that prior to the bankruptcy settlement would have been incurred by Tronox.


VIII. ENFORCEMENT

For Administrative purposes, information concerning confidential enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Lindsay Light II Site/545 North McClurg Court, Chicago, Illinois, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for this Site (Attachment 2). Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed removal action. You may indicate your decision by signing below.

APPROVE:



Director, Superfund Division

8-14-14

Date

DISAPPROVE:

Director, Superfund Division

Date

Enforcement Confidential Addendum

Figures

- 1: Figure provided by RPS GaiaTech Demonstrating at least 3 elevated gamma areas
2. EPA's Thorium Monitoring Area Map

Attachments

- 1 EJSscreen Report dated July 15, 2014
2. Index to the Administrative Record

cc: S. Fielding, U.S. EPA, 5203-G

V. Darby, U.S. Department of Interior, w/o Enf Addendum

J. Kim, Illinois Environmental Protection Agency, w/o Enf. Addendum

T. Rettig, Illinois Department of Natural Resources, w/o Enf. Addendum

B. Everetts, Illinois Environmental Protection Agency, w/o Enf. Addendum

A. Khayyat, Illinois Emergency Management Agency, w/o Enf. Addendum

J. Johnson, Illinois Emergency Management Agency, w/o Enf. Addendum

M. Ames, Chicago Department of Law, w/o Enf. Addendum

B. Haller, Chicago Department of Planning and Development, w/o Enf. Addendum

BCC PAGE HAS BEEN REDACTED

**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ENFORCEMENT ADDENDUM

HAS BEEN REDACTED – THREE PAGES

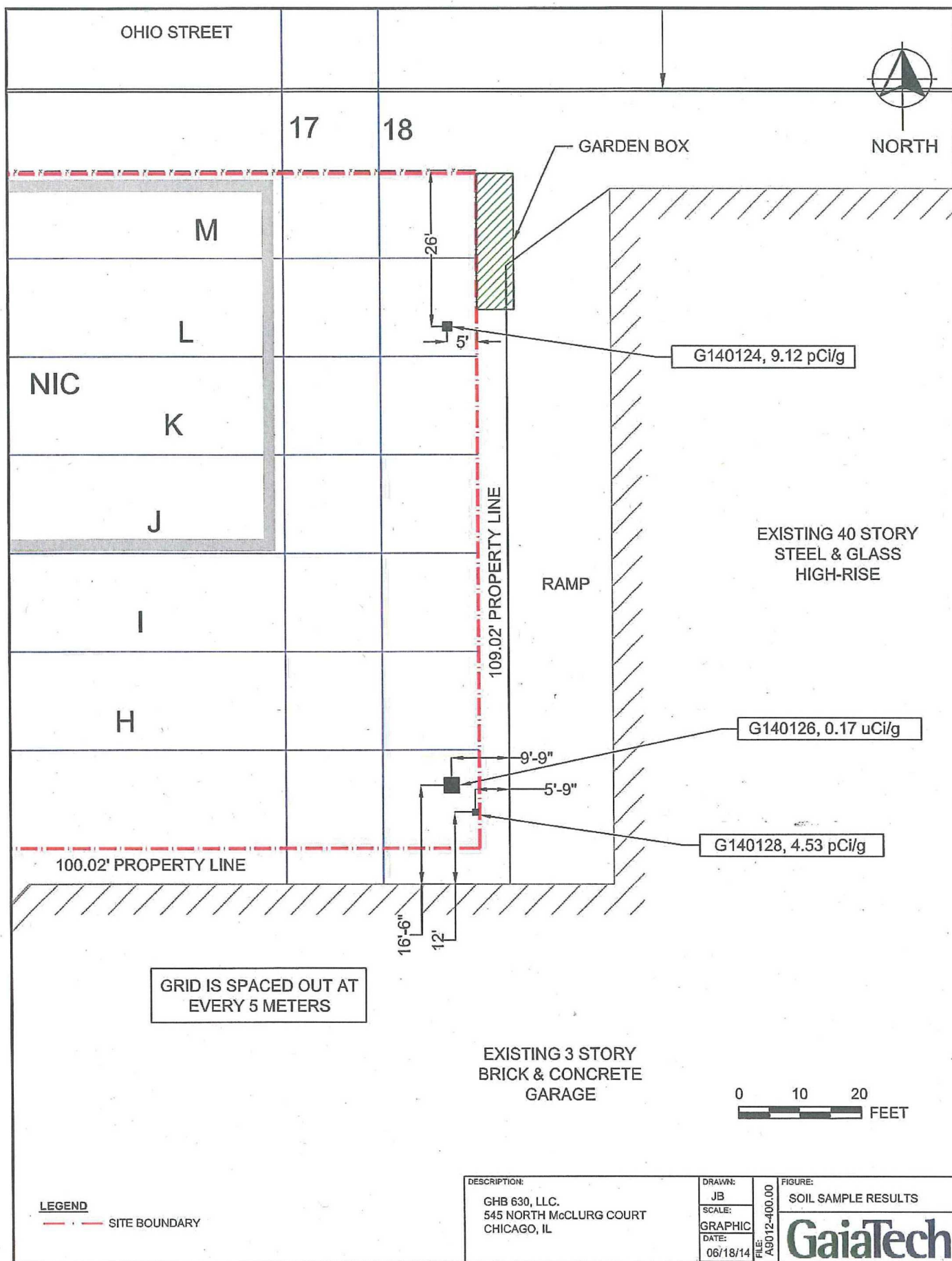
ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION



Lindsay Light Streeterville Thorium Monitoring Area

Disclaimer: This map is for illustrative purposes only, does not accurately depict legal surveys or descriptions, and is subject to change. The information described and depicted includes areas undergoing investigations and cleanups. This map may contain errors, omissions, or positional inaccuracies, and should not be relied upon to confirm or refute the presence of thorium contamination. To confirm the information depicted, contact EPA Region 5, Emergency Response: Verneta Simon (312) 886-3601 or Gene Jablonowski (312) 886-4591.



*Deed restriction required due to uninvestigated or known contamination areas.

**All surface contamination removed. Multiple properties within area have been cleaned up.

†Demolition monitoring required.

0 400 800 1,600 2,400 3,200 Feet



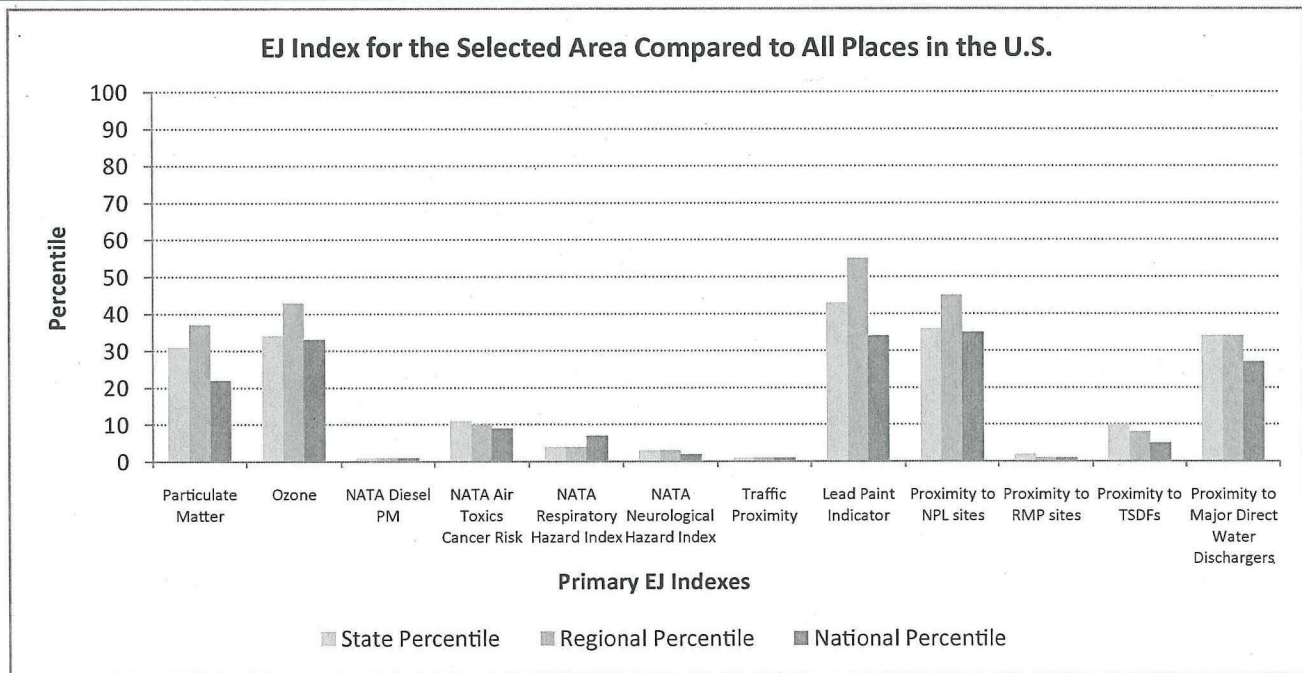
April 9, 2014



**EJScreen Report for 0.5 Mile Ring Centered
at 41.892 N, -87.618 W, Illinois
Approximate Population: 19001**

07/15/14

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Primary EJ Indexes			
Particulate Matter	31	37	22
Ozone	34	43	33
NATA Diesel PM	1	1	1
NATA Air Toxics Cancer Risk	11	10	9
NATA Respiratory Hazard Index	4	4	7
NATA Neurological Hazard Index	3	3	2
Traffic Proximity	1	1	1
Lead Paint Indicator	43	55	34
Proximity to NPL sites	36	45	35
Proximity to RMP sites	2	1	1
Proximity to TSDFs	10	8	5
Proximity to Major Direct Water Dischargers	34	34	27



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators.

**EJScreen Report for 0.5 Mile Ring Centered
at 41.892 N, -87.618 W, Illinois
Approximate Population: 19001**

07/15/14

Selected Variables	Raw Data	State Avg.	State %ile	EPA Region Avg.	EPA Region %ile	USA Avg.	USA %ile
Environmental Factors							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	14.2	13.4	81	13.3	78	10.7	95
Ozone (ppb)	41.2	42.8	15	45	11	46	21
NATA Diesel PM ($\mu\text{g}/\text{m}^3$)	4.17	0.9690	99	0.7140	99	0.8250	98
NATA Air Toxics Cancer Risk (risk per MM)	110	59	99	52	99	61	95
NATA Respiratory Hazard Index	6.2	2.4	99	2	99	3.1	91
NATA Neurological Hazard Index	0.2	0.0730	97	0.0670	98	0.0630	98
Traffic Proximity (daily traffic count/distance to road)	610	68	99	69	99	110	97
Lead Paint Indicator (% Pre-1960s Housing)	0.13	0.43	26	0.40	24	0.31	39
Proximity to NPL sites (facility count/km distance)	0.03	0.0710	36	0.0850	36	0.0960	35
Proximity to RMP sites (facility count/km distance)	2	0.43	98	0.33	99	0.31	98
Proximity to TSDFs (facility count/km distance)	0.15	0.0910	84	0.0670	90	0.0660	91
Proximity to Major Direct Dischargers (count/km)	0.14	0.27	47	0.23	56	0.25	54
Primary Demographic Index	20%	33%	42	27%	52	34%	36
Minority Population	26%	36%	52	23%	72	35%	51
Low Income Population	15%	29%	29	30%	25	32%	24
Linguistically Isolated Population	4%	6%	65	3%	81	5%	67
Population With Less Than High School Education	1%	14%	5	13%	5	15%	5
Population Under 5 years of age	2%	7%	9	7%	9	7%	10
Population over 64 years of age	16%	12%	74	13%	72	13%	73

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

ATTACHMENT 2

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION**

**ADMINISTRATIVE RECORD
FOR THE
LINDSAY LIGHT II SITE
OPERABLE UNIT 14: 545 N. MCCLURG
CHICAGO, COOK COUNTY, IL**

**UPDATE # 12
AUGUST, 2014**

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	227597	7/31/00	Simon, V., U.S. EPA	Paridy, N., Property Owner	Letter re: Walkover Survey of Parking Lot	8
2	227596	12/21/00	Simon, V., U.S. EPA	Harding, S., Rehabilitation Institute of Chicago	Letter re: Results of Walkover Survey of Parking Lot	5
3	225821	7/17/2002	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - OU 5 - Original <i>(Documents on this index are included by reference in this Administrative Record)</i>	5
4	237450	7/18/2005	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - OU 11 - Original <i>(Documents on this index are included by reference in this Administrative Record)</i>	3
5	169546	1/17/2006	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - OU 10 - Original <i>(Documents on this index are included by reference in this Administrative Record)</i>	1

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
6	269376	11/7/2006	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - OU 6 - Original <i>(Documents on this index are included by reference in this Administrative Record)</i>	3
7	286425	4/25/2008	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - OU 7 - Original <i>(Documents on this index are included by reference in this Administrative Record)</i>	4
8	348105	6/24/2010	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - OU 4 - Original <i>(Documents on this index are included by reference in this Administrative Record)</i>	8
9	374553	12/9/2010	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - OU 16 - Original <i>(Documents on this index are included by reference in this Administrative Record)</i>	3
10	405516	9/28/2011	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - Original and Updates 1-7 - OU 00, Updates 8 and 10 - OU 3, Update 9 - Post-Update Decision Documents, and Update 11 - OU18 <i>(Documents on this index are included by reference in this Administrative Record)</i>	17
11	435430	12/12/11	McCandless, G., Illinois Emergency Management Agency	Dombrowski, L., Edwards Wildman Palmer, LLP	Letter re: Reclassification of Pre- 1978 11(e) 2 Byproduct Materials	1
12	437085	6/25/2012	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - OU 13 - Original <i>(Documents on this index are included by reference in this Administrative Record)</i>	3

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
13	441203	11/9/2012	U.S. EPA	Public	Administrative Record Site Index - Lindsay Light II - Removal Action - OU 20 - Original <i>(Documents on this index are included by reference in this Administrative Record)</i>	2
14	913801	1/21/14	GaiaTech	U.S. EPA	Thorium Screening Investigation and Soil Management Workplan - Excavation/Trenching for Site Preparation and Foundation Construction	212
15	914162	4/9/14	U.S. EPA	Public	Map - Lindsay Light Streeterville Thorium Monitoring Area	1
16	914200	4/10/14	Jablonowski, E., U.S. EPA	File	Photo re: Navy Pier	1
17	914201	4/10/14	Jablonowski, E., U.S. EPA	File	Photo re: Asbestos Mantle Ties at Navy Pier	1
18	914202	5/11/14	Jablonowski, E., U.S. EPA	File	Lindsay Mantle Frames	1
19	913800	6/13/14	Yang, J., GaiaTech	Simon, V., U.S. EPA	Email re: Notification of Detecting Potential Elevated Levels of Thorium on Lindsay/545 N. McClurg AKA 410 E. Grand	1
20	913802	6/19/14	Yang, J., GaiaTech	Simon, V., U.S. EPA	Soil Sample Results - 545 North McClurg Court	18
21	914165	7/16/14	Bertsch, L., GaiaTech	Simon, V., U.S. EPA	Photo re: Spaghetti-like Material Found at Lindsay Light II OU14 (Transmittal Email Attached)	2
22	914199	7/18/14	EMSL Analytical	File	Chain of Custody for Asbestos Bulk Building Materials	1
23	914198	7/21/14	EMSL Analytical	GaiaTech	Asbestos Analysis of Bulk Materials	1
24	913803	No date	Carter, C., Property Manager	U.S. EPA	Owner Contact Information for the Adjacent Parking Property to the East	1

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
25	-	-	Simon, V., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum re: Request for Approval of a Time-Critical Removal Action at the Lindsay Light II, Operable Unit 14 Site (PENDING)	-